

U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

April 25, 2022

BY ECF

The Honorable George B. Daniels United States District Court Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Willie Evans et al., S5 20 Cr. 57 (GBD)

Dear Judge Daniels:

The Government writes, with the consent of all defense counsel, to respectfully request an adjournment of the May 4, 2022 status conference. The Government has been in ongoing plea negotations with many of the defendants, and the Government anticipates reaching additional plea agreements with some of the defendants in the coming months. Accordingly, the parties jointly request that the upcoming conference be adjourned for approximately 60 days. The requested adjournment will allow defendants additional time to review the discovery and to consult with their counsel concerning potential motions or pretrial dispositions.

The Government additionally requests, with the consent of all defense counsel, that the Court exclude the time between May 4, 2022 and the next conference date from calculation under the Speedy Trial Act. Such an exclusion would allow the defendants and defense counsel to review discovery and contemplate bringing any motions, it would give the parties an opportunity to discuss the possibility of any pretrial dispositions, and it would be in the interest of justice. See 18 U.S.C. § 3161.

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Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By:<u>s/</u>

Rushmi Bhaskaran
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cc: All Counsel of Record (by ECF)